

Exhibit E

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CALIFORNIANS FOR
ALTERNATIVES TO TOXICS

Appearing pro se
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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

CALIFORNIANS FOR ALTERNATIVES TO Case No.: 3:24-cv-06632-SI
TOXICS,

v.
TRAVIS MOREDA DAIRY and TRAVIS
MOREDA,

**STIPULATION TO EXTEND TIME TO
RESPOND TO COMPLAINT AND TO
DATES IN ORDER SETTING INITIAL
CASE MANAGEMENT CONFERENCE
AND ADR DEADLINES; [PROPOSED]
ORDER THEREON**

Honorable Susan Illston

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1 WHEREAS, Plaintiff Californians for Alternatives to Toxics filed a complaint (ECF
2 No.1) on September 20, 2024, and Defendants Travis Moreda Dairy and Travis Moreda's
3 response are due November 25, 2024 (*see* ECF No. 7 (Waiver of Service of Summons));

4 WHEREAS, the Parties seek additional time to explore settlement opportunities;

5 WHEREAS, Defendants' response to the complaint is due during the Thanksgiving
6 holiday;

7 WHEREAS, the Parties therefore wish to stipulate to extend, by a period of
8 approximately thirty days, the time within which Defendants must file their response from
9 November 25, 2024 to December 27, 2024, and all other dates in the Court's Order Setting
10 Initial Case Management Conference and ADR Deadlines by approximately thirty days;

12 WHEREAS, the Parties also wish to stipulate to extend, by a period of thirty days, the
13 time within which Plaintiff may file an opposition to Defendants' response, should such an
14 opposition be appropriate and necessary;

16 WHEREAS, pursuant to Local Rule 6-2, this stipulation is accompanied by a declaration
17 setting forth with particularity, the reasons for the requested enlargement of time (to allow
18 further settlement discussion and to account for intervening holidays), all previous time
19 modifications in the case (none), and the effect the requested time modification would have on
20 the schedule for the case (none) (See Declaration of William N. Carlon in Support of Stipulation
21 to Extend Time, filed herewith);

22 THEREFORE, it is hereby stipulated and agreed, by and among the Parties, through their
23 undersigned attorneys of record, subject to the approval of the Court, that there is good cause for
24 the following:

26 1. Defendants shall have an extension to file their response to the complaint, from
27 November 25, 2024 to December 27, 2024;

1 2. Plaintiff shall file an opposition to Defendants' response, if applicable, by
2 February 3, 2025;

3 3. The deadline for the Parties to meet and confer pursuant to Federal Rule of Civil
4 Procedure 26(f) will be extended from December 23, 2024 to January 22, 2025;

5 4. The deadline for the Parties to make initial disclosures will be extended from
6 January 3, 2025 to February 3, 2025;

7 5. The deadline for the Parties to file their Joint Case Management Statement will be
8 extended from January 3, 2025 to February 3, 2025;

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10 6. The date for the Court to hold its initial Case Management Conference will be
11 extended from January 10, 2025 to February 14, 2025 or another date thereafter at the Court's
12 convenience.

13 IT IS SO STIPULATED.

14 Dated: November 19, 2024

LAW OFFICE OF WILLIAM CARLON

15 By: /s/ William N. Carlon

16 William N. Carlon
17 Attorney for Plaintiff
18 Californians for Alternatives to Toxics

19 Dated: November 19, 2024

TRAVIS MOREDA DAIRY

20 By: /s/Travis Moreda

21 Travis Moreda, d.b.a. Travis Moreda Dairy
22 *Appearing Pro Se*

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ORDER

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ORDER ON STIPULATION TO EXTEND TIME TO RESPOND TO COMPLAINT AND
TO DATES IN ORDER SETTING INITIAL CASE MANAGEMENT CONFERENCE
3
AND ADR DEADLINES

4 Good cause appearing, and PURSUANT TO STIPULATION:

5 1. Defendants shall have an extension to file their response to the complaint, from
6 November 25, 2024 to December 27, 2024;

7 2. Plaintiff shall file an opposition to Defendants' response, if applicable, by
8 February 3, 2025;

9 3. The deadline for the Parties to meet and confer pursuant to Federal Rule of Civil
10 Procedure 26(f) will be extended from December 23, 2024 to January 22, 2025;

11 4. The deadline for the Parties to make initial disclosures will be extended from
12 January 3, 2025 to February 3, 2025;

13 5. The deadline for the Parties to file their Joint Case Management Statement will be
14 extended from January 3, 2025 to February 3, 2025;

15 6. The date for the Court to hold its initial Case Management Conference will be
16 extended from January 10, 2025 to _____.

17 IT IS SO ORDERED.

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19 Dated: _____

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23 Susan Illston
24 United States District Judge
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STIPULATION EXTENDING TIME

Case No. 3:24-cv-06632-SI

ATTESTATION FOR E-FILING

I hereby attest pursuant to Civil L.R. 5-1(i)(3) that I have obtained concurrence in the filing of this document from the other Signatory prior to filing.

DATED: November 19, 2024

By: /s/ William N. Carlon